

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA**

LAUREN BAKER,

Plaintiff,

v.

LENNAR CORPORATION,

Defendant.

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Civil Action No.:

COMPLAINT FOR COPYRIGHT INFRINGEMENT

Plaintiff, Lauren Baker (“Baker” or “Plaintiff”), brings this complaint in the United States District Court for the Southern District of Florida against LENNAR CORPORATION (“Lennar” or “Defendant”), alleging as follows:

THE PARTIES

1. Plaintiff Lauren Baker is an experienced commercial photographer, specializing in landscapes and nature photography. Baker resides in San Antonio, Florida.
2. Defendant is a Corporation organized and existing under the laws of the State of Florida with its principal place of business located in Miami, Florida. Defendant’s agent for service of process is CT Corporation System, 1200 South Pine Island Road, Plantation, Florida, 33324.

JURISDICTION AND VENUE

3. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. §§ 1331 and 1338(a).
4. This Court has personal jurisdiction over Defendant because Defendant has maintained sufficient minimum contacts with the State of Florida and as a result the exercise of personal

jurisdiction over Defendant by this Court would not offend traditional notices of fair play and substantial justice.

5. Venue is proper in this district pursuant to 28 U.S.C. § 1400(a) because Defendant or its agent(s) reside or may be found in this district: “A defendant ‘may be found’ in a district in which he could be served with process; that is, in a district which may assert personal jurisdiction over the defendant.”

FACTS

I. The Photographs at Issue in this Lawsuit

6. On May 27, 2023, Lauren Baker captured the photographs, “IMG_8841,” “IMG_8840,” “IMG_8839,” “IMG_8838,” “IMG_8837,” “IMG_8836,” “IMG_8835,” (“Copyrighted Photographs”) copies of which are exhibited below:









7. Copyrighted Photographs were registered by Lauren Baker with the United States Copyright Office on April 29, 2024 (Registration No.: VA 2-407-955).

8. For all times relevant to this action, Plaintiff has been the author and exclusive copyright holder of all copyright rights in and to Copyrighted Photographs. As such, Plaintiff is entitled to institute and maintain this action for copyright infringement. See 17 U.S.C. § 501(b).

II. Defendant's Unlawful Activities

9. Defendant is a home construction company that specializes in single family homes, townhomes and condominiums, fifty-five and older communities, and multigenerational homes.

Lennar does business throughout the United States.

10. Beginning on or about June 1, 2023, Defendant copied, posted, or caused to be posted Copyrighted Photographs to the Stellar MLS (Multiple Listing Service) website, www.stellar.mlsmatrix.com/matrix ("MLS Infringements"), for the following properties for rent or sale in San Antonio, Florida 33576:

- 10292 Trumpet Honeysuckle Way
- 10334 Trumpet Honeysuckle Way
- 10336 Trumpet Honeysuckle Way
- 10330 Honey Hammock Way
- 10334 Honey Hammock Way
- 10958 Gable Dig Loop
- 10371 Trumpet Honeysuckle Way
- 11012 Gable Dig Loop
- 10998 Gable Dig Loop
- 10337 Trumpet Honeysuckle Way
- 10288 Honey Hammock Way
- 10992 Gable Dig Loop
- 10335 Honey Hammock Way
- 10894 Gable Dig Loop
- 10874 Gable Dig Loop
- 10856 Gable Dig Loop
- 11545 Radiant Shore Loop
- 32126 Pop Ash Pl
- 11442 Radiant Shore Loop
- 32131 Pop Ash Pl
- 10347 Honey Hammock Way
- 11672 Radiant Shore Loop
- 11650 Radiant Shore Loop
- 11677 Radiant Shore Loop
- 10694 Tupper Cay Dr
- 11570 Radiant Shore Loop

- 32325 Wishing Haven Dr
- 10761 Tupper Cay Dr
- 32324 Wishing Haven Dr
- 10675 Tupper Cay Dr
- 11385 Linden Depot Rd
- 32301 Wishing Haven Dr
- 10631 Tupper Cay Dr
- 11484 Radiant Shore Loop
- 10686 Tupper Cay Dr
- 10678 Tupper Cay Dr
- 10658 Tupper Cay Dr
- 11377 Linden Depot Rd
- 11457 Linden Depot Rd
- 11595 Radiant Shore Loop
- 11498 Radiant Shore Loop
- 10742 Tupper Cay Dr
- 11437 Linden Depot Rd
- 11401 Linden Depot Rd
- 32310 Wishing Haven Dr
- 11445 Linden Depot Rd
- 11478 Linden Depot Rd
- 32338 Cannon Rush Dr
- 10342 Trumpet Honeysuckle Way
- 10352 Honey Hammock Way
- 10356 Trumpet Honeysuckle Way
- 10374 Trumpet Honeysuckle Way
- 10370 Trumpet Honeysuckle Way
- 10338 Trumpet Honeysuckle Way
- 10320 Trumpet Honeysuckle Way
- 10375 Trumpet Honeysuckle Way
- 10356 Honey Hammock Way
- 10365 Trumpet Honeysuckle Way
- 10360 Honey Hammock Way
- 10346 Honey Hammock Way
- 10379 Trumpet Honeysuckle Way
- 10387 Trumpet Honeysuckle Way
- 32038 Powderpuff Mimosa Dr
- 11011 Gable Dig Loop
- 10948 Gable Dig Loop
- 11016 Gable Dig Loop

- 32220 Cannon Rush Dr
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- 11008 Gable Dig Loop
- 32164 Powderpuff Mimosa Dr
- 11004 Gable Dig Loop
- 10315 Honey Hammock Way
- 11629 Radiant Shore Loop
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- 32135 Pop Ash Pl
- 10321 Honey Hammock Way
- 10341 Honey Hammock Way
- 10359 Honey Hammock Way
- 11306 Linden Depot Rd
- 11708 Radiant Shore Loop
- 32100 Powderpuff Mimosa Dr
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- 11742 Radiant Shore Loop
- 11265 Linden Depot Rd
- 11465 Linden Depot Rd
- 11429 Linden Depot Rd
- 11415 Linden Depot Rd
- 11571 Radiant Shore Loop
- 11530 Radiant Shore Loop
- 10683 Tupper Cay Dr
- 11750 Radiant Shore Loop
- 11686 Radiant Shore Loop
- 11642 Radiant Shore Loop
- 11607 Radiant Shore Loop
- 11721 Radiant Shore Loop
- 11524 Radiant Shore Loop
- 11634 Radiant Shore Loop
- 11714 Radiant Shore Loop
- 11460 Linden Depot Rd
- 11384 Linden Depot Rd
- 11701 Radiant Shore Loop
- 11664 Radiant Shore Loop
- 10653 Tupper Cay Dr
- 11743 Radiant Shore Loop

- 11333 Linden Depot Rd
- 11400 Linden Depot Rd
- 10646 Tupper Cay Dr
- 11393 Linden Depot Rd
- 11307 Linden Depot Rd
- 11358 Linden Depot Rd
- 11428 Linden Depot Rd
- 32302 Wishing Haven Dr
- 32260 Cannon Rush Dr
- 32279 Cannon Rush Dr
- 32248 Cannon Rush Dr
- 32303 Cannon Rush Dr
- 32274 Cannon Rush Dr
- 11093 Linden Depot Rd
- 31670 Cannon Rush Dr
- 10969 Gable Dig Loop
- 11028 Radiant Shore Loop
- 11078 Radiant Shore Loop
- 11042 Radiant Shore Loop
- 10378 Honey Hammock Way
- 32115 Powderpuff Mimosa Dr
- 10388 Trumpet Honeysuckle Way
- 10398 Trumpet Honeysuckle Way
- 32131 Powderpuff Mimosa Dr
- 32111 Powderpuff Mimosa Dr
- 32073 Powderpuff Mimosa Dr
- 32137 Powderpuff Mimosa Dr
- 32157 Powderpuff Mimosa Dr
- 10400 Trumpet Honeysuckle Way
- 32153 Powderpuff Mimosa Dr
- 32171 Powderpuff Mimosa Dr
- 32167 Powderpuff Mimosa Dr
- 10417 Lavender Aster Trl
- 10447 Lavender Aster Trl
- 10374 Honey Hammock Way
- 32163 Powderpuff Mimosa Dr
- 32121 Powderpuff Mimosa Dr
- 32117 Powderpuff Mimosa Dr
- 32127 Powderpuff Mimosa Dr
- 10429 Lavender Aster Trl

- 10425 Lavender Aster Trl
- 10421 Lavender Aster Trl
- 32251 Powderpuff Mimosa Dr
- 32197 Powderpuff Mimosa Dr
- 32193 Powderpuff Mimosa Dr
- 10413 Lavender Aster Trl
- 10455 Lavender Aster Trl
- 32125 Powderpuff Mimosa Dr
- 31524 Magna Gulf Loop
- 10407 Lavender Aster Trl
- 32211 Powderpuff Mimosa Dr
- 32187 Powderpuff Mimosa Dr
- 32181 Cannon Rush Dr
- 10451 Lavender Aster Trl
- 10433 Lavender Aster Trl
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- 32153 Cannon Rush Dr
- 32140 Cannon Rush Dr
- 10359 Lavender Aster Trl
- 32180 Cannon Rush Dr
- 32168 Cannon Rush Dr
- 32211 Cannon Rush Dr
- 32146 Powderpuff Mimosa Dr
- 11772 Radiant Shore Loop
- 10958 Radiant Shore Loop
- 32235 Cannon Rush Dr
- 32039 Pop Ash Pl
- 32071 Pop Ash Pl
- 10981 Gable Dig Loop
- 32052 Powderpuff Mimosa Dr
- 32124 Powderpuff Mimosa Dr
- 32192 Cannon Rush Dr
- 10392 Lavender Aster Trl
- 32134 Powderpuff Mimosa Dr
- 32094 Powderpuff Mimosa Dr
- 11014 Radiant Shore Loop
- 32112 Powderpuff Mimosa Dr
- 10376 Lavender Aster Trl
- 32070 Powderpuff Mimosa Dr
- 32059 Pop Ash Pl

- 32062 Powderpuff Mimosa Dr
- 11193 Linden Depot Rd
- 10380 Lavender Aster Trl
- 32046 Powderpuff Mimosa Dr
- 11756 Radiant Shore Loop
- 11244 Linden Depot Rd
- 11000 Radiant Shore Loop
- 32088 Powderpuff Mimosa Dr
- 32056 Powderpuff Mimosa Dr
- 32140 Powderpuff Mimosa Dr
- 32106 Powderpuff Mimosa Dr
- 32085 Pop Ash Pl
- 11257 Linden Depot Rd
- 11205 Linden Depot Rd
- 11180 Linden Depot Rd
- 11237 Linden Depot Rd
- 11210 Linden Depot Rd
- 11177 Linden Depot Rd
- 11123 Linden Depot Rd
- 10502 Tupper Cay Dr
- 11022 Radiant Shore Loop
- 11100 Radiant Shore Loop
- 11048 Radiant Shore Loop
- 32016 Hawthorne Cottage Pl
- 11021 Radiant Shore Loop
- 11278 Linden Depot Rd
- 11151 Linden Depot Rd
- 11751 Radiant Shore Loop
- 10981 Radiant Shore Loop
- 11737 Radiant Shore Loop
- 11788 Radiant Shore Loop
- 11131 Linden Depot Rd
- 11092 Linden Depot Rd
- 10534 Tupper Cay Dr
- 10623 Tupper Cay Dr
- 10518 Gable Dig Loop
- 32086 Hawthorne Cottage Pl
- 10639 Tupper Cay Dr
- 10502 Gable Dig Loop
- 10482 Gable Dig Loop

- 11289 Linden Depot Rd
- 10460 Gable Dig Loop
- 11172 Linden Depot Rd
- 11065 Linden Depot Rd
- 11270 Linden Depot Rd
- 11006 Radiant Shore Loop
- 11222 Linden Depot Rd
- 11294 Linden Depot Rd
- 10970 Radiant Shore Loop
- 10510 Gable Dig Loop
- 11070 Radiant Shore Loop
- 10992 Radiant Shore Loop
- 11064 Radiant Shore Loop
- 11759 Radiant Shore Loop
- 11034 Radiant Shore Loop
- 11109 Linden Depot Rd
- 10523 Gable Dig Loop
- 11134 Linden Depot Rd
- 11058 Radiant Shore Loop
- 11079 Linden Depot Rd
- 11163 Linden Depot Rd
- 10499 Gable Dig Loop
- 11091 Radiant Shore Loop
- 11764 Radiant Shore Loop
- 11797 Radiant Shore Loop
- 10490 Gable Dig Loop
- 11277 Linden Depot Rd
- 10507 Gable Dig Loop
- 11084 Radiant Shore Loop
- 10460 Tupper Cay Dr
- 10615 Tupper Cay Dr
- 11796 Radiant Shore Loop
- 11009 Radiant Shore Loop
- 10583 Tupper Cay Dr
- 10540 Tupper Cay Dr
- 11139 Linden Depot Rd
- 11039 Radiant Shore Loop
- 11124 Linden Depot Rd
- 10964 Radiant Shore Loop
- 10474 Gable Dig Loop

- 10995 Radiant Shore Loop
- 11258 Linden Depot Rd
- 10609 Tupper Cay Dr
- 10510 Tupper Cay Dr
- 11164 Linden Depot Rd
- 10610 Tupper Cay Dr
- 10634 Tupper Cay Dr
- 11185 Linden Depot Rd
- 11194 Linden Depot Rd
- 11213 Linden Depot Rd
- 11150 Linden Depot Rd
- 10597 Tupper Cay Dr
- 11229 Linden Depot Rd
- 10548 Tupper Cay Dr
- 10534 Gable Dig Loop
- 11286 Linden Depot Rd
- 11245 Linden Depot Rd
- 10296 Trumpet Honeysuckle Way
- 10300 Trumpet Honeysuckle Way
- 10302 Trumpet Honeysuckle Way
- 10306 Trumpet Honeysuckle Way

11. Examples of MLS Infringements are illustrated below:

The screenshot displays the StellarMLS website interface. At the top, there is a navigation bar with links for MY MATRIX, SEARCH, STATS, TAX, LINKS, FINANCE, ADD/EDIT, MARKET REPORTS, and OMNI MLS. A search bar contains the text "RES". Below the navigation bar, the main content area shows a property listing for "11307 LINDEN DEPOT ROAD, SAN ANTONIO, Florida 33576". The listing includes a photo of a house, a virtual tour link, and detailed property information. The property details are as follows:

11307 LINDEN DEPOT RD, SAN ANTONIO, FL 33576	
County: Pasco	Status: Sold
Subdiv: MIRADA	Backups Requested: No
Subdiv/Condo:	On Market Date: 10/13/2023
Beds: 6	List Price: \$498,660
Baths: 3/0	Year Built: 2024
Pool: None	Special Sale: None
Property Style: Single Family Residence	ADOM: 66
Total Acreage: 0 to less than 1/4	CDOM: 66
Garage: Yes Attch: Yes Spcs: 2	Pets: Yes
Garage/Parking Features:	Carport: No Spcs:
Assigned Spcs:	Heated Area: 3,326 SqFt / 309 SqM
LP/SqFt: \$149.93	Total Area: 3,726 SqFt / 346 SqM
New Construction: Yes	
Total Annual Assoc Fees: \$948.04	
Average Monthly Fees: \$79.00	
Flood Zone Code:	
Builder Name: LENNAR	Sold Date: 04/12/2024
Builder Model: TRENTON	Sold Price: \$494,900
Permit Number: 00	SP / SqFt: \$148.80
Proj Comp Date: 04/12/2024	

The bottom of the screenshot shows a pagination bar with "281" selected, and a list of actions including Refine, Save, Carts, Criteria, Email, Print, Share Link, CMA, Directions, Stats, Export, Quick CMA, Cloud CMA, ShowingCart, and Custom PDF Reports.

Matrix

https://stellar.mlsmatrix.com/Matrix/Results.aspx?c=H4slAAAAAAEAIWMjSzMFLSUTIBYksgNJYzgpF5pTk5EELJyBIZSwShZAg0

RES

Include other criteria


Recent Searches

Previous Next 1 of 92 Checked 0 All None Page Agent Single Line display Display 360 Property View at 1 per page

10378 HONEY HAMMOCK WAY, SAN ANTONIO, Florida 33576

Listing Tax Photos History Parcel Map Flood Map Foreclosure

T3473216 10378 HONEY HAMMOCK WAY, SAN ANTONIO, FL 33576



County: Pasco
Subdiv: MIRADA TOWNHOMES
Beds: 3
Baths: 2/1
Pool: None
Property Style: Townhouse
Total Acreage: 0 to less than 1/4
Garage: Yes Attch: Yes Spcs: 1
Garage/Parking Features:
Assigned Spcs:
LP/SqFt: \$165.01
New Construction: Yes
Total Annual Assoc Fees: \$4,430.04
Average Monthly Fees: \$369.17
Flood Zone Code: X
Builder Name: Lennar
Builder Model: ST THOMAS
Permit Number: 00
Proj Comp Date: 03/01/2024

Status: Sold
Backups Requested: No
On Market Date: 09/18/2023
List Price: \$274,900
Year Built: 2024
Special Sale: None
ADOM: 32
CDOM: 32
Pets: Yes
Carport: No Spcs:
Heated Area: 1,666 SqFt / 155 SqM
Total Area: 1,866 SqFt / 173 SqM

16 / 22

Virtual Tour 1: Click Here

Under Construction. Luxury is in the details of this charming two-story townhome. The first floor enjoys an airy design among the spacious living room, kitchen and dining room, opening to the covered patio for serene outdoor moments. Upstairs, an adaptable central loft leads to two secondary bedrooms and the tranquil owner's suite. The owner's suite is in a privately situated corner, showcasing a full-sized bathroom and large walk-in closet. Interior photos disclosed are different from the actual model being built. Mirada is a masterplan community in San Antonio, FL, with townhomes and single-family homes now selling. All residents of Mirada will enjoy special benefits at the 15-acre Mirada Lagoon. The Lagoon is the largest in the nation and sits at the heart of Mirada, delivering a beach lifestyle with swimming, kayaking, paddleboarding and

Actions Refine Save Carts

Criteria Email Print Share Link CMA Directions Stats Export Quick CMA Cloud CMA ShowingCart Custom PDF Reports

Matrix

https://stellar.mlsmatrix.com/Matrix/Results.aspx?c=H4slAAAAAAEAIWMjSzMFLSUTIBYksgNJYzgpF5pTk5EELJyBIZSwShZKg0

Stellar Support: 800-686-7451 | Logon

StellarMLS MY MATRIX


RES

Previous Next 2 of 92 Checked

32115 POWDERPU

Listing Tax Photos History

T3443192 32



18 / 27

Virtual Tour 1: Click Here

Actions Refine Save Carts

Criteria Email Print Share Link CMA Directions Stats Export Quick CMA Cloud CMA ShowingCart Custom PDF Reports

StellarMLS MY MATRIX SEARCH STATS TAX LINKS FINANCE ADD/EDIT MARKET REPORTS OMNI MLS Hello, Brian

RES Include other criteria Recent Searches

Criteria Map Results

Previous Next 4 of 92 Checked 0 All None Page Agent Single Line display Display 360 Property View at 1 per page

32111 POWDERPUFF MIMOSA DRIVE, SAN ANTONIO, Florida 33576 View Comparable Properties

Listing Tax Photos History Parcel Map Flood Map Foreclosure

T3451139 32111 POWDERPUFF MIMOSA DR, SAN ANTONIO, FL 33576

County: Pasco Status: Sold

Subdiv: MIRADA TOWNHOMES Backups Requested: No

Subdiv/Condo: On Market Date: 06/07/2023

Beds: 2 List Price: \$284,990

Baths: 2/1 Year Built: 2023

Pool: None Special Sale: None

Property Style: Townhouse ADOM: 21

Total Acreage: 0 to less than 1/4 CDOM: 21

Garage: Yes Attach: Yes Spcs: 1 Pets: Yes

Garage/Parking Features: Carport: No Spcs:

Assigned Spcs: Heated Area: 1,541 SqFt / 143 SqM

LP/SqFt: \$184.94 Total Area: 1,741 SqFt / 162 SqM

New Construction: Yes

Total Annual Assoc Fees: \$4,430.04

Average Monthly Fees: \$369.17

Flood Zone Code: X

Builder Name: LENNAR

Builder Model: GLENMOOR

Permit Number: 00

Proj Comp Date: 10/25/2023

Sold Date: 11/27/2023

Sold Price: \$284,990

SP / SqFt: \$184.94

16 / 24 Virtual Tour 1: Click Here

Actions Refine Save Carts

Criteria Email Print Share Link CMA Directions Stats Export Quick CMA Cloud CMA ShowingCart Custom PDF Reports

StellarMLS MY MATRIX SEARCH STATS TAX LINKS FINANCE ADD/EDIT MARKET REPORTS OMNI MLS Hello, Brian

RES Include other criteria Recent Searches

Criteria Map Results

Previous Next 6 of 92 Checked 0 All None Page Agent Single Line display Display 360 Property View at 1 per page

32137 POWDERPUFF MIMOSA DRIVE, SAN ANTONIO, Florida 33576 View Comparable Properties

Listing Tax Photos History Parcel Map Flood Map Foreclosure

T3451141 32137 POWDERPUFF MIMOSA DR, SAN ANTONIO, FL 33576

County: Pasco Status: Sold

Subdiv: MIRADA TOWNHOMES Backups Requested: No

Subdiv/Condo: On Market Date: 06/07/2023

Beds: 2 List Price: \$286,990

Baths: 2/1 Year Built: 2023

Pool: None Special Sale: None

Property Style: Townhouse ADOM: 22

Total Acreage: 0 to less than 1/4 CDOM: 22

Garage: Yes Attach: Yes Spcs: 1 Pets: Yes

Garage/Parking Features: Carport: No Spcs:

Assigned Spcs: Heated Area: 1,541 SqFt / 143 SqM

LP/SqFt: \$186.24 Total Area: 1,741 SqFt / 162 SqM

New Construction: Yes

Total Annual Assoc Fees: \$4,430.04

Average Monthly Fees: \$369.17

Flood Zone Code: X

Builder Name: LENNAR

Builder Model: GLENMOOR

Permit Number: 00

Proj Comp Date: 10/25/2023

Sold Date: 11/28/2023

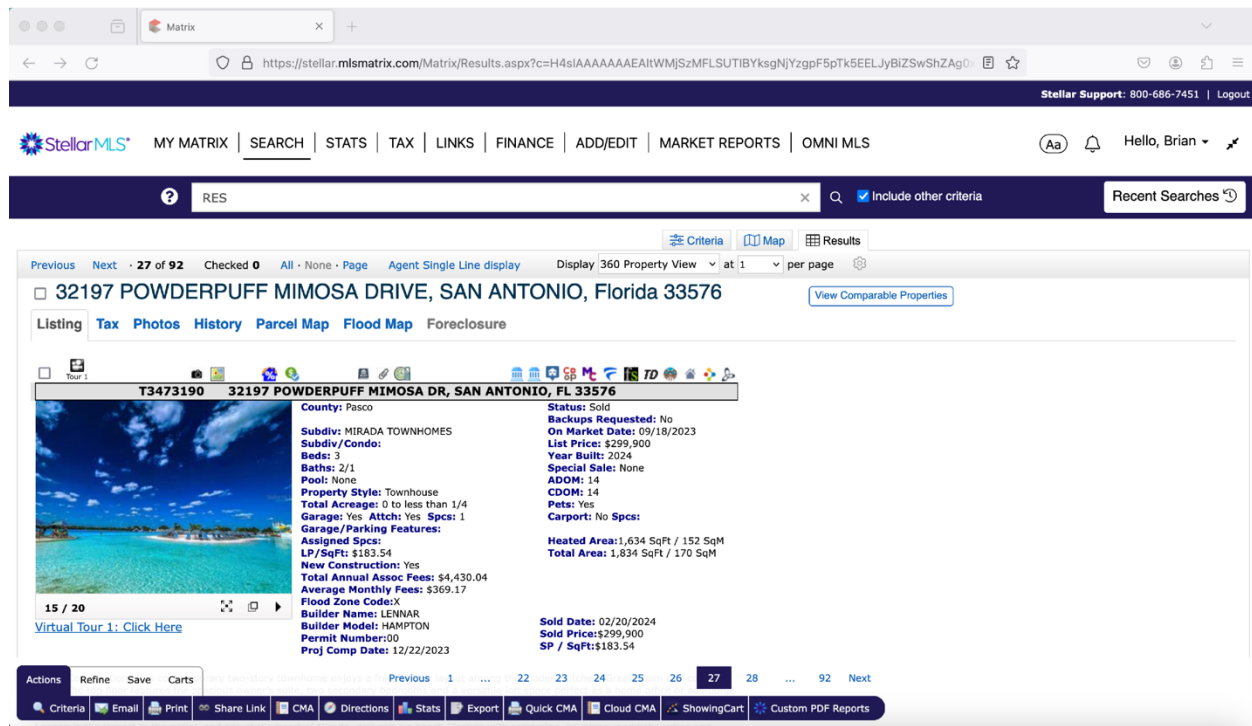
Sold Price: \$286,990

SP / SqFt: \$186.24

17 / 24 Virtual Tour 1: Click Here

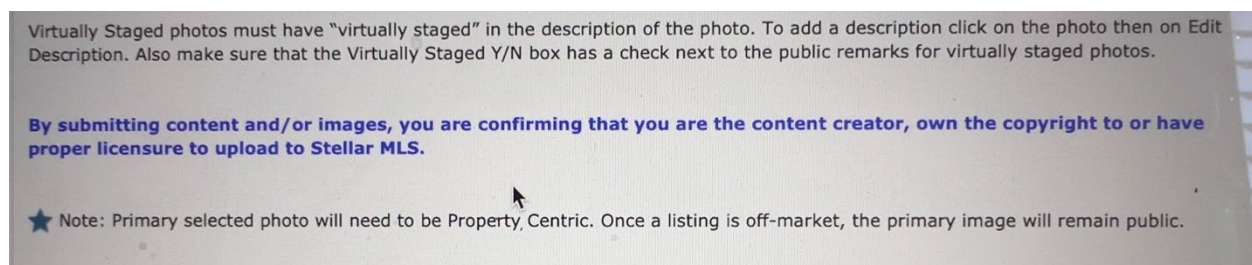
Actions Refine Save Carts

Criteria Email Print Share Link CMA Directions Stats Export Quick CMA Cloud CMA ShowingCart Custom PDF Reports



12. Before uploading its unauthorized copies of Copyrighted Photographs to Stellar MLS, Defendant falsely attested it was the author of, copyright holder of, or was properly licensed to upload of Copyrighted Photographs.

13. Before uploading its unauthorized copies of Copyrighted Photographs to Stellar MLS, Defendant falsely attested to the following: “By submitting content and/or images, you are confirming that you are the content creator, own the copyright to or have proper licensure to upload to Stellar MLS:”



14. Beginning on or about June 1, 2023, Defendant copied, posted, or caused to be posted Copyrighted Photographs to Zillow (“Zillow Infringements”), www.zillow.com, for the following property listings in San Antonio, Florida 33576:

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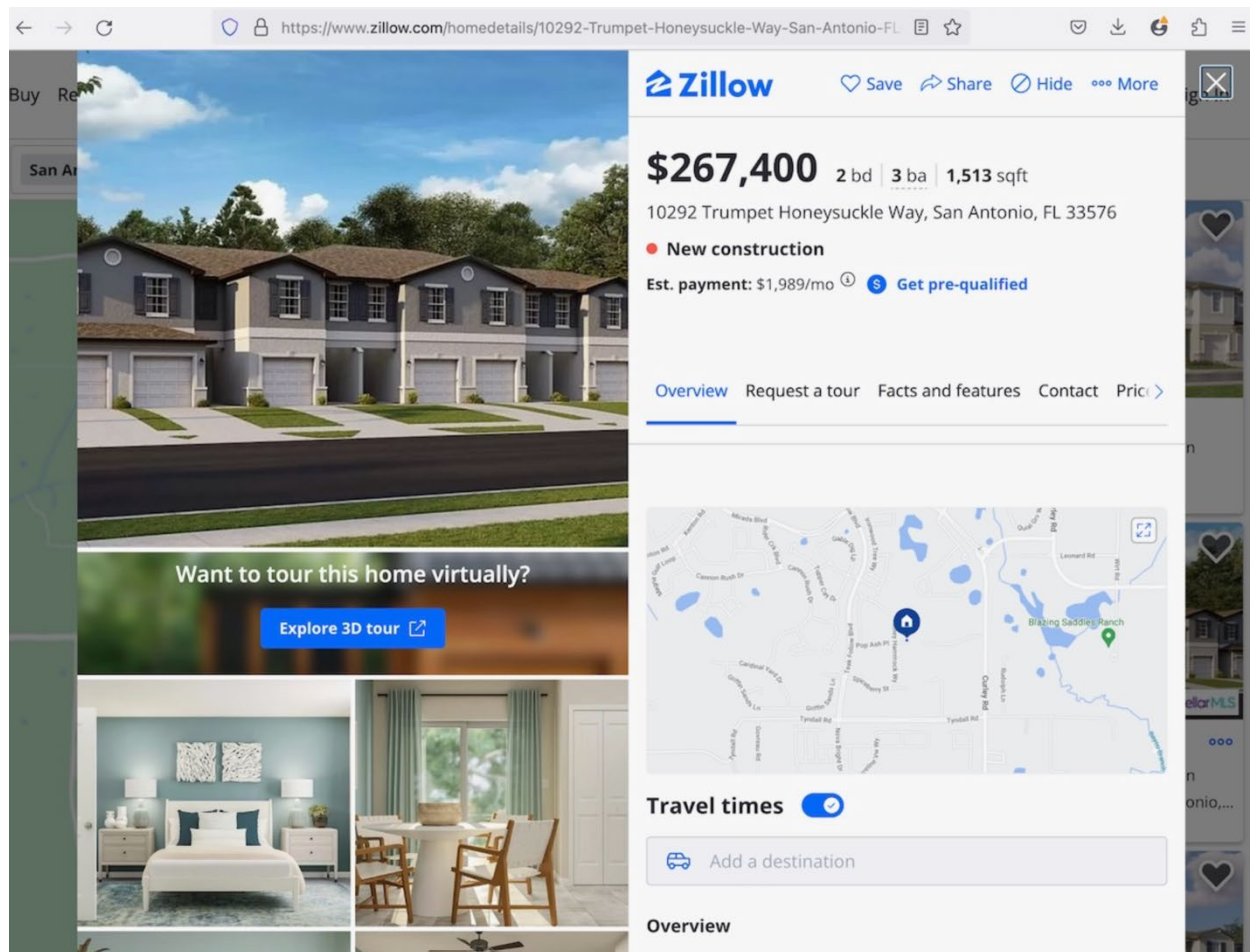
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- 32134 Powderpuff Mimosa Dr
- 32094 Powderpuff Mimosa Dr
- 11014 Radiant Shore Loop
- 32112 Powderpuff Mimosa Dr
- 10376 Lavender Aster Trl
- 32070 Powderpuff Mimosa Dr
- 32059 Pop Ash Pl
- 32062 Powderpuff Mimosa Dr
- 11193 Linden Depot Rd
- 10380 Lavender Aster Trl
- 32046 Powderpuff Mimosa Dr
- 11756 Radiant Shore Loop
- 11244 Linden Depot Rd
- 11000 Radiant Shore Loop
- 32088 Powderpuff Mimosa Dr
- 32056 Powderpuff Mimosa Dr

- 32140 Powderpuff Mimosa Dr
- 32106 Powderpuff Mimosa Dr
- 32085 Pop Ash Pl
- 11257 Linden Depot Rd
- 11205 Linden Depot Rd
- 11180 Linden Depot Rd
- 11237 Linden Depot Rd
- 11210 Linden Depot Rd
- 11177 Linden Depot Rd
- 11123 Linden Depot Rd
- 10502 Tupper Cay Dr
- 11022 Radiant Shore Loop
- 11100 Radiant Shore Loop
- 11048 Radiant Shore Loop
- 32016 Hawthorne Cottage Pl
- 11021 Radiant Shore Loop
- 11278 Linden Depot Rd
- 11151 Linden Depot Rd
- 11751 Radiant Shore Loop
- 10981 Radiant Shore Loop
- 11737 Radiant Shore Loop
- 11788 Radiant Shore Loop
- 11131 Linden Depot Rd
- 11092 Linden Depot Rd
- 10534 Tupper Cay Dr
- 10623 Tupper Cay Dr
- 10518 Gable Dig Loop
- 32086 Hawthorne Cottage Pl
- 10639 Tupper Cay Dr
- 10502 Gable Dig Loop
- 10482 Gable Dig Loop
- 11289 Linden Depot Rd
- 10460 Gable Dig Loop
- 11172 Linden Depot Rd
- 11065 Linden Depot Rd
- 11270 Linden Depot Rd
- 11006 Radiant Shore Loop
- 11222 Linden Depot Rd
- 11294 Linden Depot Rd
- 10970 Radiant Shore Loop

- 10510 Gable Dig Loop
- 11070 Radiant Shore Loop
- 10992 Radiant Shore Loop
- 11064 Radiant Shore Loop
- 11759 Radiant Shore Loop
- 11034 Radiant Shore Loop
- 11109 Linden Depot Rd
- 10523 Gable Dig Loop
- 11134 Linden Depot Rd
- 11058 Radiant Shore Loop
- 11079 Linden Depot Rd
- 11163 Linden Depot Rd
- 10499 Gable Dig Loop
- 11091 Radiant Shore Loop
- 11764 Radiant Shore Loop
- 11797 Radiant Shore Loop
- 10490 Gable Dig Loop
- 11277 Linden Depot Rd
- 10507 Gable Dig Loop
- 11084 Radiant Shore Loop
- 10460 Tupper Cay Dr
- 10615 Tupper Cay Dr
- 11796 Radiant Shore Loop
- 11009 Radiant Shore Loop
- 10583 Tupper Cay Dr
- 10540 Tupper Cay Dr
- 11139 Linden Depot Rd
- 11039 Radiant Shore Loop
- 11124 Linden Depot Rd
- 10964 Radiant Shore Loop
- 10474 Gable Dig Loop
- 10995 Radiant Shore Loop
- 11258 Linden Depot Rd
- 10609 Tupper Cay Dr
- 10510 Tupper Cay Dr
- 11164 Linden Depot Rd
- 10610 Tupper Cay Dr
- 10634 Tupper Cay Dr
- 11185 Linden Depot Rd
- 11194 Linden Depot Rd

- 11213 Linden Depot Rd
- 11150 Linden Depot Rd
- 10597 Tupper Cay Dr
- 11229 Linden Depot Rd
- 10548 Tupper Cay Dr
- 10534 Gable Dig Loop
- 11286 Linden Depot Rd
- 11245 Linden Depot Rd
- 10296 Trumpet Honeysuckle Way
- 10300 Trumpet Honeysuckle Way
- 10302 Trumpet Honeysuckle Way
- 10306 Trumpet Honeysuckle Way

15. Examples of Zillow Infringements are illustrated below:



Buy Re

San An

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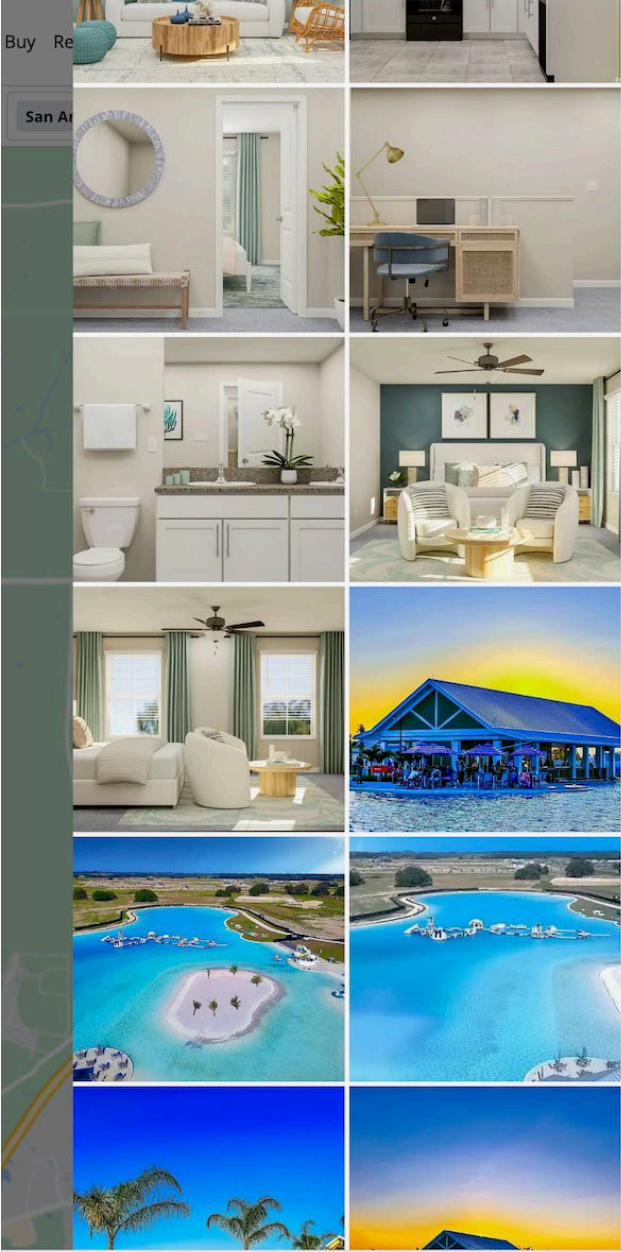
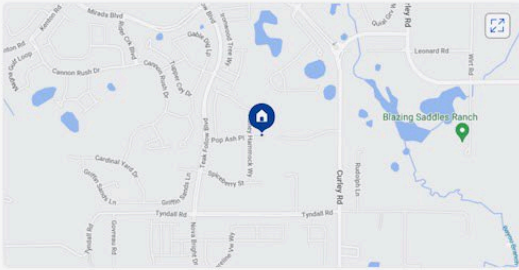
\$267,400 2 bd 3 ba 1,513 sqft

10292 Trumpet Honeysuckle Way, San Antonio, FL 33576


• **New construction**

Est. payment: \$1,989/mo ⓘ [Get pre-qualified](#)

[Overview](#) [Request a tour](#) [Facts and features](#) [Contact](#) [Price](#)

Travel times ☒

 Add a destination

Overview

9 days on Zillow | 171 views | 3 saves

Under Construction. BRAND NEW HOME!! - This contemporary two-story townhome features a modern open-concept layout among the Great Room, kitchen and dining space on the first floor. Through sliding glass doors is a covered patio for outdoor moments. Upstairs, a loft joins a bedroom with attached bathroom and the comfortable owner's suite with a walk-in closet. Completing the home is a one-car garage. Interior photos disclosed are different from the actual model being built. • Mirada is a masterplan community in San

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https://www.zillow.com/homedetails/10292-Trumpet-Honeysuckle-Way-San-Antonio-FL-33576/2052836913_zpid/?altId=13910001_lot:3036712#

Buy Re San Ar

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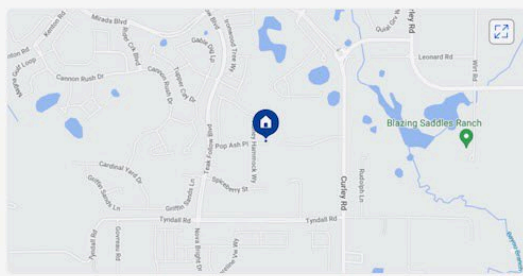
\$267,400 2 bd 3 ba 1,513 sqft

10292 Trumpet Honeysuckle Way, San Antonio, FL 33576

New construction

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Overview

9 days on Zillow | 171 views | 3 saves

Under Construction. BRAND NEW HOME!! - This contemporary two-story townhome features a modern open-concept layout among the Great Room, kitchen and dining space on the first floor. Through sliding glass doors is a covered patio for outdoor moments. Upstairs, a loft joins a bedroom with attached bathroom and the comfortable owner's suite with a walk-in closet. Completing the home is a one-car garage. Interior photos disclosed are different from the actual model being built. • Mirada is a masterplan community in San

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https://www.zillow.com/homedetails/10292-Trumpet-Honeysuckle-Way-San-Antonio-FL-...

Zillow Save Save Home Share X

\$267,400 2 bd | 3 ba | 1,513 sqft
10292 Trumpet Honeysuckle Way, San Antonio, FL 33576
• **New construction**
Est. payment: \$1,989/mo ⓘ Get pre-qualified

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9 days on Zillow 171 views 3 saves

Under Construction, BRAND NEW HOME!! - This contemporary two-story townhome features a modern open-concept layout among the Great Room, kitchen and dining space on the first floor. Through sliding glass doors is a covered patio for outdoor moments. Upstairs, a loft joins a bedroom with attached bathroom and the comfortable owner's suite with a walk-in closet. Completing the home is a one-car garage. Interior photos disclosed are different from the actual model being built. • Mirada is a masterplan community in San

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New Construction: \$267,400 (2 beds, 3 baths, 1,513 Square Feet)

Buy Re

San A

11012 Gable Dig Loop, San Antonio, FL 33576

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\$289,900 2 bd | 2 ba | 1,398 sqft

11012 Gable Dig Loop, San Antonio, FL 33576

Pending

Est. payment: \$2,306/mo **Get pre-qualified**

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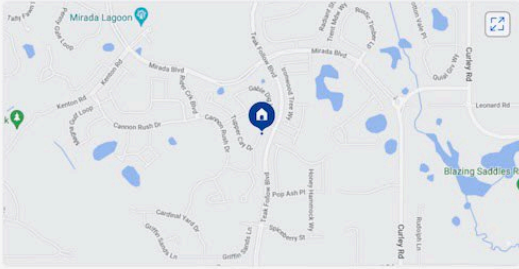
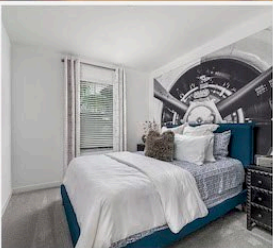

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Travel times

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Overview

137 days on Zillow | **35 views** | **3 saves**

Under Construction. BRAND NEW HOME!! - This convenient single-story home features two bedrooms, including a privately situated owner's suite with an attached full bathroom and walk-in closet. On the opposite side, there is an open floorplan showcasing the stylish kitchen, dining room and inviting family room in a cohesive flow to deliver seamless everyday living. Nearby are glass-sliders that lead to a cozy

BAKER, L... 10658 Tu... 01475-Bal... Request: ... Angus & ... PLAYING (28) Matt... Contact | 11012 C X 10292 Tru +

https://www.zillow.com/homedetails/11012-Gable-Dig-Loop-San-Antonio-FL-33576/205

Zillow Save Share Hide More

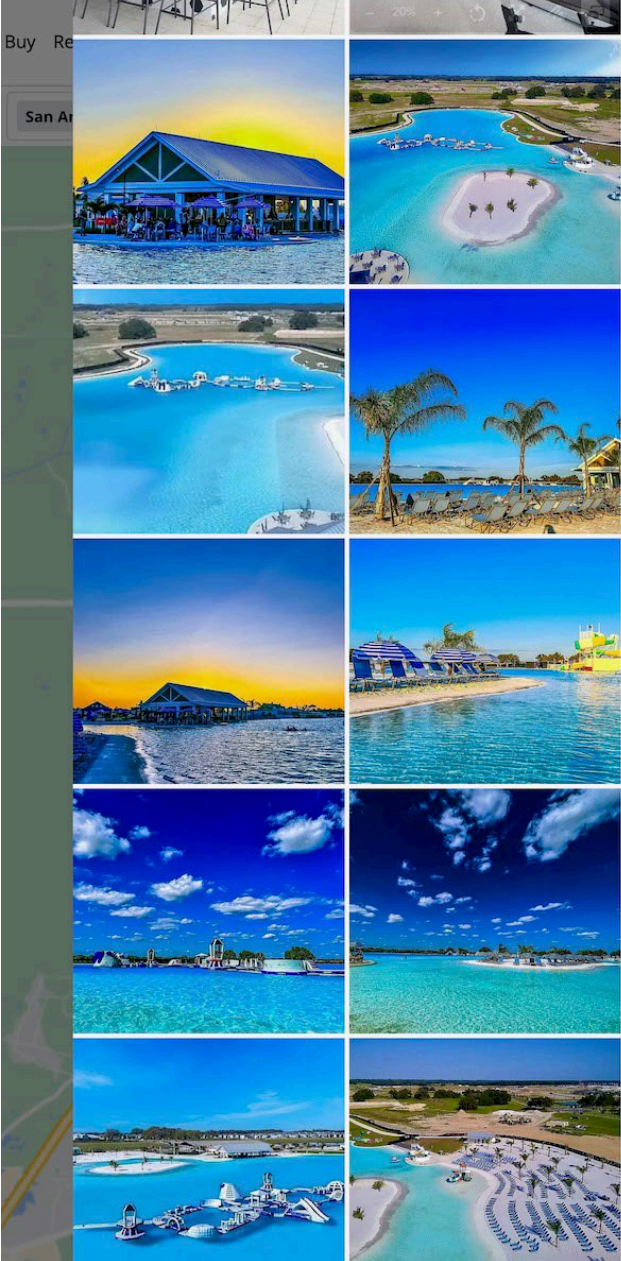
\$289,900 2 bd | 2 ba | 1,398 sqft
11012 Gable Dig Loop, San Antonio, FL 33576

Pending
Est. payment: \$2,306/mo [Get pre-qualified](#)

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137 days on Zillow | 35 views | 3 saves

Under Construction. BRAND NEW HOME!! - This convenient single-story home features two bedrooms, including a privately situated owner's suite with an attached full bathroom and walk-in closet. On the opposite side, there is an open floorplan showcasing the stylish kitchen, dining room and inviting family room in a cohesive flow to deliver seamless everyday living. Nearby are glass-sliders that lead to a cozy

Buy Re

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https://www.zillow.com/homedetails/11012-Gable-Dig-Loop-San-Antonio-FL-33576/205

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\$289,900 2 bd | 2 ba | 1,398 sqft

11012 Gable Dig Loop, San Antonio, FL 33576

● Pending

Est. payment: \$2,306/mo ⓘ Get pre-qualified

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everyday living. Nearby are grass-sliders that lead to a cozy covered patio, ideal for outdoor activities. Interior photos disclosed are different from the actual model being built. •

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Community
Mirada Active Adult : Active Adult Villas
Source: Lennar Homes

Builder: Lennar
Call: (863) 694-0575

Learn more about the builder:
View builder profile

Listing Provided by: Ben Goldstein 813-917-9080
LENNAR REALTY 813-917-9080

Source: Stellar MLS / MFRMLS, MLS#: T3487474

StellarMLS

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https://www.zillow.com/homedetails/11012-Gable-Dig-Loop-San-Antonio-FL-33576/2054296538_zpid/#

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10675 Tupper Cay Dr, San Antonio, FL 33576

Zillow Save Share Hide More

\$409,900 2 bd 2 ba 1,959 sqft

10675 Tupper Cay Dr, San Antonio, FL 33576

Pending

Est. payment: \$3,035/mo [Get pre-qualified](#)



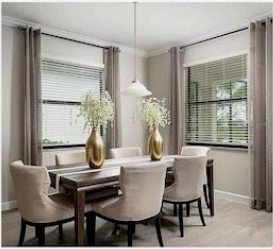
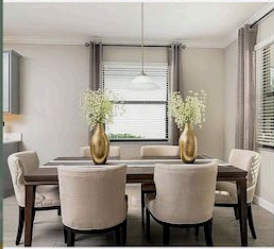
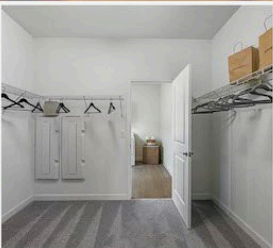
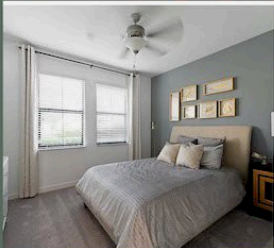
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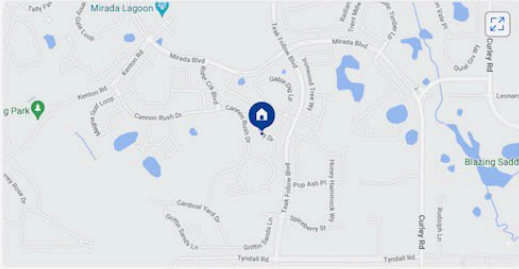
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Overview

74 days on Zillow | 13 views | 0 saves

Under Construction. BRAND NEW HOME!! - "One of Tampa Bay's best Active Adult Lifestyle Communities" A multipurpose flex room is great for any number of hobbies in this spacious single-story home, while an open floorplan containing the family room, kitchen and dining room offers combined living and entertainment with access to a peaceful covered patio. The adjacent owner's suite is separate from the front bedroom

Buy Re

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10675 Tupper Cay Dr, San Antonio, FL 33576

Zillow Save Share Hide More

\$409,900 2 bd | 2 ba | 1,959 sqft

10675 Tupper Cay Dr, San Antonio, FL 33576

Pending

Est. payment: \$3,035/mo [Get pre-qualified](#)

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for increased serenity. Interior photos are different from the actual model disclosed being built. Nestled in the quiet city of

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SPACIOUS SINGLE-STORY HOME **MULTIPURPOSE FLEX ROOM**

NEW SINGLE-FAMILY HOMES

Builder: Lennar
Call: (727) 619-2650

Learn more about the builder:
[View builder profile](#)

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LENNAR REALTY 813-917-9080

Source: Stellar MLS / MFRMLS, MLS#: T3498940 [StellarMLS](#)

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\$409,900 2 bd | 2 ba | 1,959 sqft
10675 Tupper Cay Dr, San Antonio, FL 33576

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Est. payment: \$3,035/mo [Get pre-qualified](#)

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SPACIOUS SINGLE-STORY HOME **MULTIPURPOSE FLEX ROOM**

NEW SINGLE-FAMILY HOMES

Builder: Lennar
Call: (727) 619-2650

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Source: Stellar MLS / MFRMLS, MLS#: T3498940 [StellarMLS](#)

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Mirada Active Adult : Active Adult Manors

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https://www.zillow.com/homedetails/10948-Gable-Dig-Loop-San-Antonio-FL-33576/201

Zillow Save Share Hide More

\$334,900 2 bd | 2 ba | 1,616 sqft

10948 Gable Dig Loop, San Antonio, FL 33576

Pending

Est. payment: \$2,263/mo [Get pre-qualified](#)

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[NEW SINGLE-FAMILY HOMES](#) [WELL-EQUIPPED KITCHEN](#)

[SPORTS COURTS](#)

Builder: Lennar
Call: (863) 694-0575

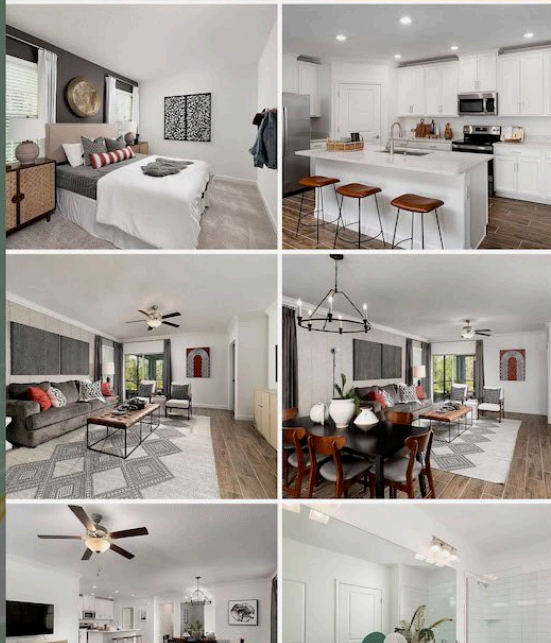
Learn more about the builder:
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Listing Provided by: Ben Goldstein 813-917-9080
LENNAR REALTY 813-917-9080

Source: Stellar MLS / MFRMLS, MLS#: T3484408 [StellarMLS](#)

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https://www.zillow.com/homedetails/10948-Gable-Dig-Loop-San-Antonio-FL-33576/20

Zillow Save Share Hide More

\$334,900 2 bd | 2 ba | 1,616 sqft

10948 Gable Dig Loop, San Antonio, FL 33576

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Est. payment: \$2,263/mo ⓘ [Get pre-qualified](#)

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Listing Provided by: Ben Goldstein 813-917-9080
LENNAR REALTY 813-917-9080

Source: Stellar MLS / MFRMLS, MLS#: T3484408

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\$334,900 2 bd | 2 ba | 1,616 sqft
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Builder: Lennar
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Community
Mirada Active Adult : Active Adult Villas
Source: Lennar Homes

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16. Zillow Infringements included the following information: “Builder: Lennar, Call: (863) 694-0575,” Listing Provided by: Ben Goldstein 813-917-9080, LENNAR REALTY 813-917-9080,” and “Source: Stellar MLS / MFRMLS, MLS# T3484408.”

17. Defendant is not and has never been licensed to use or display Copyrighted Photographs. Defendant never contacted Plaintiff to seek permission to use Copyrighted Photographs in connection with its website or for any other purpose.

18. Upon information and belief, Defendant located copies of Copyrighted Photographs on the internet and, rather than contact Plaintiff to secure licenses, simply copied Copyrighted Photographs for its own commercial use.

19. Plaintiff first discovered Defendant's unauthorized use/display of Copyrighted Photographs on or about March 6, 2024. Following Plaintiff's discovery, Plaintiff notified Defendant in writing of such unauthorized use. To date, Plaintiff has been unable to negotiate a reasonable license for the past infringement of Copyrighted Photographs.

COUNT I: COPYRIGHT INFRINGEMENT

20. Plaintiff incorporates herein by this reference each and every allegation contained in each paragraph above.

21. Copyrighted Photographs are original works of authorship, embodying copyrightable subject matter, and therefore subject to the full protection of the United States copyright laws (17 U.S.C. § 101 et seq.).

22. Lauren Baker owns a valid copyright in Copyrighted Photographs, having registered Copyrighted Photographs with the Register of Copyrights.

23. Plaintiff has standing to bring this lawsuit and assert the claim(s) herein as it has sufficient rights, title, and interest to such copyright.

24. Defendant reproduced, distributed, and publicly displayed Copyrighted Photographs without authorization from Plaintiff.

25. By its actions, Defendant infringed and violated Plaintiff's exclusive rights in violation of the Copyright Act, 17 U.S.C. § 501, by reproducing, distributing, and publicly displaying Copyrighted Photographs for its own commercial purposes.

26. Defendant's infringement was willful as it acted with actual knowledge or reckless disregard for whether its conduct infringed upon Plaintiff's copyright.

27. Plaintiff has been damaged as a direct and proximate result of Defendant's infringement.

28. Plaintiff is entitled to recover its actual damages resulting from Defendant's unauthorized use of Copyrighted Photographs and, at Plaintiff's election (pursuant to 17 U.S.C. § 504(b)), Plaintiff is entitled to recover damages based on a disgorgement of Defendant's profits from infringement of Copyrighted Photographs, which amounts shall be proven at trial.

29. Alternatively, to the extent infringement by Defendant of Copyrighted Photographs occurred post-registration or within the three (3) month period between first publication and registration, and at Plaintiff's election, Plaintiff is entitled to statutory damages pursuant to 17 U.S.C. § 504(c), in such amount as deemed proper by the Court.

30. To the extent infringement by Defendant of Copyrighted Photographs occurred post-registration or within the three (3) month period between first publication and registration, Plaintiff is further entitled to recover its costs and attorneys' fees as a result of Defendant's conduct pursuant to 17 U.S.C. § 505 for such infringement of the corresponding Copyrighted Photographs.

WHEREFORE, Plaintiff demands judgment against Defendant as follows:

- a. A declaration that Defendant has infringed Plaintiff's copyrights in Copyrighted Photographs;
- b. A declaration that such infringement is willful (to the extent applicable);

- c. An award of actual damages and disgorgement of profits as the Court deems proper or, at Plaintiff's election (to the extent applicable), an award of statutory damages for willful infringement up to \$150,000.00 for infringement of each photograph comprising the Work.
- d. Awarding Plaintiff its costs and (if applicable) reasonable attorneys' fees pursuant to 17 U.S.C. § 505;
- e. Awarding Plaintiff interest, including prejudgment interest, on the foregoing amounts;
- f. Permanently enjoining Defendant, its employees, agents, officers, directors, attorneys, successors, affiliates, subsidiaries, and assigns, and all those in active concert and participation with Defendant, from directly or indirectly infringing Plaintiff's copyrights or continuing to display, transfer, advertise, reproduce, or otherwise market Copyrighted Photographs or to participate or assist in any such activity; and
- g. For such other relief as the Court deems just and proper.

JURY DEMAND

Plaintiff hereby demands a trial by jury on all claims for which there is a right to jury trial.

Dated: September 30, 2024

Respectfully submitted,

/s/ Janelle A. Weber
Janelle A. Weber
Florida Bar No. 17630
Manta Law
4039 Gunn Highway
Tampa, FL 33618
813-982-3363, Telephone
jweber@mantalaw.com
Counsel for Plaintiff

-and-

/s/ David C. Deal
David C. Deal
VA Bar No. 86005
The Law Office of David C. Deal, P.L.C.
117 4th Street NE
Charlottesville, VA 22902
434-233-2727, Telephone
david@daviddeal.com
Counsel for Plaintiff
Pro Hac Vice Admission pending